

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
SOUTHWESTERN DIVISION

UNITED STATES OF AMERICA

v.

WILLIAM SHORT

INDICTMENT

Case No. _____

Violation: 18 U.S.C. §§ 2252(a)(2),
2252(a)(4)(B), 2252(b)(1), 2252(b)(2),
and 2253(a)

COUNT ONE

Receipt of Materials Involving the Sexual Exploitation of Minors

The Grand Jury Charges:

From an unknown time to on or about August 14, 2015, in the District of North Dakota, and elsewhere,

WILLIAM SHORT

knowingly received visual depictions using any means and facility of interstate and foreign commerce and which had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT TWO

Possession of Materials Involving the Sexual Exploitation of Minors

The Grand Jury Further Charges:

On or about August 14, 2015, in the District of North Dakota,

WILLIAM SHORT

knowingly possessed and accessed with intent to view, numerous computer files containing visual depictions that had been shipped and transported using any means and facility of interstate and foreign commerce, namely, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and which visual depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of violating Title 18, United States Code, Section 2252, as charged in this Indictment,

WILLIAM SHORT

shall forfeit to the United States any and all matter which contains visual depictions produced, transported, shipped, and received in violation thereof and any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violations including, but not limited to, the following:

- One HP Pavilion desktop computer, with S/N 3CR8100R98
- One Seagate external hard drive, with S/N NA0Q3YGP
- One Toshiba laptop computer, with S/N 3C321136K

By virtue of commission of one or more of the felony offenses as charged in this Indictment, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States, pursuant to Title 18, United States Code, Section 2253(a).

A TRUE BILL:

/s/ Grand Jury Foreperson
Foreperson

/s/ Christopher C. Myers
CHRISTOPHER C. MYERS
United States Attorney

GLD/aap